

Exhibit 1

1 - EVREN ERYUREK -

2
3 IN THE UNITED STATES DISTRICT COURT
4 FOR THE SOUTHERN DISTRICT OF NEW YORK
----- X
5 ULKU ROWE,

6 Plaintiff,

7 Case No.
8 19 Civ. 08655(LGS)(GWG)

9 v.

10 GOOGLE LLC

11 Defendant.
----- X

12 DATE: December 3, 2020
13 TIME: 11:37 a.m.

14 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
15 OF EVREN ERYUREK, held via Zoom, pursuant to
16 Notice, before Hope Menaker, a Shorthand Reporter
17 and Notary Public of the State of New York.
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38 to 41

<p style="text-align: right;">Page 38</p> <p>1 - EVREN ERYUREK -</p> <p>2 what percentage is on-prem versus Cloud?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. I don't know. There are guesses</p> <p>5 somewhere between 5 to 10 percent workloads.</p> <p>6 Q. And are you able to place in time</p> <p>7 when the migration to on -- to Cloud based first</p> <p>8 began in the U.S.?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. The leader in the industry was AWS so</p> <p>11 they started 10-plus years ago, maybe 14 years</p> <p>12 ago. That's when it started.</p> <p>13 Q. And when did Google first get into</p> <p>14 Cloud-based services?</p> <p>15 A. Google has always been on Clouds, but</p> <p>16 if you're referring to Google Cloud Platform to</p> <p>17 sell externally -- can you clarify what you mean</p> <p>18 by that?</p> <p>19 Q. Yes, exactly. When did Google first</p> <p>20 start offering Cloud-based services externally?</p> <p>21 A. I think first was 2014. I was very</p> <p>22 early into the journey, you know, not -- not long</p> <p>23 before I joined. Maybe 2014.</p> <p>24 Q. Okay. So going back to the</p> <p>25 discussion of your role in OCTO, who did you</p>	<p style="text-align: right;">Page 40</p> <p>1 - EVREN ERYUREK -</p> <p>2 A. Constantly.</p> <p>3 Q. What about with respect to client</p> <p>4 engagements; would one director ever assist</p> <p>5 another director with a client engagement or</p> <p>6 substitute for a director for a client engagement?</p> <p>7 A. All the time.</p> <p>8 Q. At the time the other technical</p> <p>9 directors were hired, do you know whether any --</p> <p>10 did you know the levels of the other directors?</p> <p>11 A. No.</p> <p>12 Q. Did you participate in the hiring</p> <p>13 process for other technical directors?</p> <p>14 A. Only as interviewer.</p> <p>15 Q. And which of the other technical</p> <p>16 directors did you participate in the interviewing</p> <p>17 process for?</p> <p>18 A. I think Ashwin, Mike -- maybe</p> <p>19 Michael. I think one of them left already. Many</p> <p>20 that didn't cuts, but those were the ones that we</p> <p>21 hired so I think there were like three or four of</p> <p>22 them.</p> <p>23 Q. Do you recall interviewing Ben</p> <p>24 Wilson?</p> <p>25 A. Yes. I had an interview session with</p>
<p style="text-align: right;">Page 39</p> <p>1 - EVREN ERYUREK -</p> <p>2 consider to be your peers in OCTO?</p> <p>3 MR. GAGE: Objection.</p> <p>4 A. Everyone was a peer.</p> <p>5 Q. With respect to -- let me ask you</p> <p>6 this; who amongst the other people in OCTO were</p> <p>7 performing similar roles to what you were</p> <p>8 performing?</p> <p>9 MR. GAGE: Objection.</p> <p>10 A. Just about everyone.</p> <p>11 Q. Does that include Ms. Rowe?</p> <p>12 A. Yes.</p> <p>13 MR. GAGE: Objection.</p> <p>14 A. Yes.</p> <p>15 Q. With respect to the other technical</p> <p>16 directors in OCTO, would directors collaborate</p> <p>17 with each other?</p> <p>18 A. Yes.</p> <p>19 Q. In what ways?</p> <p>20 A. Sometimes I needed help, they would</p> <p>21 come in. Sometimes they had deeper knowledge in</p> <p>22 some specific area like networking and I would</p> <p>23 call Brian and what have you.</p> <p>24 Q. Would directors ever fill in for each</p> <p>25 other on -- on speaking engagements?</p>	<p style="text-align: right;">Page 41</p> <p>1 - EVREN ERYUREK -</p> <p>2 him, but I knew Ben from my GE days so it was</p> <p>3 interview/explain because he had a lot of</p> <p>4 questions for me, so yes.</p> <p>5 Q. And do you recall what you explained</p> <p>6 to Mr. Wilson with respect to the role?</p> <p>7 A. My day-to-day role, what I do.</p> <p>8 Q. And do you recall what you shared</p> <p>9 about your day-to-day work?</p> <p>10 A. How I engage with customers, how</p> <p>11 we're building things from -- pretty much from</p> <p>12 ground up, how collaborative working in Google is,</p> <p>13 and how much more fun my life is compared to</p> <p>14 everyday traveling in GE.</p> <p>15 Q. And did you share your day-to-day</p> <p>16 responsibilities with Mr. Wilson as a way for him</p> <p>17 to understand what his day-to-day responsibilities</p> <p>18 might look like?</p> <p>19 A. I wouldn't know what his</p> <p>20 responsibilities were going to be and I only</p> <p>21 shared what I did at the time.</p> <p>22 Q. With respect to any of the people you</p> <p>23 interviewed, were you asked to evaluate whether</p> <p>24 they should be hired as a Level 8 or a Level 9?</p> <p>25 A. No.</p>

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62 to 65

<p style="text-align: right;">Page 62</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK - CONFIDENTIAL</p> <p>2 directors might be, correct?</p> <p>3 A. No.</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 64</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 Q. And what was your -- during the time</p> <p>3 period that you worked together, what was your</p> <p>4 understanding of her background?</p> <p>5 A. That she worked in a -- a bank. She</p> <p>6 was in the risk side of the bank and she was</p> <p>7 technical savvy and had good connections in the</p> <p>8 industry.</p> <p>9 Q. Do you know what positions she had</p> <p>10 held at the bank? And your answer?</p> <p>11 A. Not in detail.</p> <p>12 Q. Do you recall which bank it was?</p> <p>13 A. Was it JPMorgan, maybe.</p> <p>14 Q. Do you know whether she had worked at</p> <p>15 banks other than JPMorgan?</p> <p>16 A. I believe she did. I believe she</p> <p>17 worked in London, too.</p> <p>18 Q. Do you know how many years of</p> <p>19 financial services industry experience she had?</p> <p>20 A. No.</p> <p>21 Q. Did you know how many years of</p> <p>22 technology-based experience she had?</p> <p>23 A. No, I didn't count.</p> <p>24 Q. Was that because it wasn't really</p> <p>25 relevant to the role that you were performing?</p>
<p style="text-align: right;">Page 63</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 (Hereafter NON-CONFIDENTIAL testimony</p> <p>3 resumes.)</p> <p>4 Q. Okay. You can put that document</p> <p>5 aside.</p> <p>6 In the office of the CTO, did you</p> <p>7 ever work with Ulku Rowe?</p> <p>8 A. Yes.</p> <p>9 Q. In -- in what capacity did you have</p> <p>10 the opportunity to work with her?</p> <p>11 A. In external events, joint</p> <p>12 presentations, analysts events that we presented;</p> <p>13 and sometimes I pulled her into an executive</p> <p>14 briefing that I could use her help, sometimes she</p> <p>15 pulled me into some meetings that she could help</p> <p>16 me out -- I could help her out.</p> <p>17 Q. I know some of these are very obvious</p> <p>18 questions, but again we have to get it for the</p> <p>19 record. What was your understanding of Ms. Rowe's</p> <p>20 role at that time?</p> <p>21 A. She was a technical director in</p> <p>22 office of the CTO.</p> <p>23 Q. So she was in the same role that you</p> <p>24 were in?</p> <p>25 A. Yes. We were all in the same role.</p>	<p style="text-align: right;">Page 65</p> <p>1 - ROUGH DRAFT - EVREN ERYUREK</p> <p>2 A. No. Why, why -- I mean, she was</p> <p>3 clearly qualified. She went through the</p> <p>4 interviewing process, she came in, she -- she had,</p> <p>5 you know, credibility right there; and I was happy</p> <p>6 when I saw her name, that another Turkish fellow</p> <p>7 member joined the team, and that was it. It was</p> <p>8 only after that, you know, her name was announced</p> <p>9 I got to know and -- and so I think her name and</p> <p>10 that was that. That was that.</p> <p>11 Q. Did you at some point in time learn</p> <p>12 what her educational background was?</p> <p>13 A. During our personal conversations we</p> <p>14 would chitchat, you know, which schools we went,</p> <p>15 our families and so forth, casual.</p> <p>16 Q. What did you understand about her</p> <p>17 educational background?</p> <p>18 A. That not in too many specific details</p> <p>19 that, you know, she understood the domain,</p> <p>20 technical domain that we were in, and that she had</p> <p>21 worked in the IT world of FinTech and she</p> <p>22 understood how it works and how banks are</p> <p>23 structured and how they operate and so forth.</p> <p>24 Q. Did you know that she had a</p> <p>25 Bachelor's and a Master's in a -- in</p>